

Matter 22: Communities of the North Fringe

Is it feasible to accommodate the scale of development envisaged in the North Fringe without increasing levels of congestion?

- 1) The level of growth proposed in the Core Strategy, and by association the level of growth proposed within the Bristol Core Strategy, is supported by extensive transport modelling that informed the successful North Fringe to Hengrove Transport Package bid that was accepted by the Department for Transport in December 2011. The transport modelling was undertaken by Atkins using the G-BATS3 model. This forecasted the effect for 2016 and 2031 design year traffic movements of the Stoke Gifford Transport Link, the bus rapid transit and other measures in the package having regard to proposed levels of growth identified by the West of England Partnership. Accordingly it is contended that when approving funding towards the transport package, the Department of Transport was satisfied that the measures were sufficient to meet the future transport requirements of the North Fringe and were suitable and deliverable.

- 2) Crest Strategic Projects has controlling interests in the East of Harry Stoke New Neighbourhood Area and while it can address transport issues associated with the new neighbourhood, it is not in a position to specifically conclude on development and congestion elsewhere in the District. Therefore, our comments below focus on the transport considerations arising at the East of Harry Stoke and the beneficial transport impacts the new neighbourhood will have on the North Fringe.

- 3) The North Fringe to Hengrove Transport Package includes the Stoke Gifford Transport Link that will be accommodated as part of the East of Harry Stoke New Neighbourhood and the bus rapid transit scheme that will link the new neighbourhood with Hengrove via the Bristol City Centre. With specific regard to transport considerations arising from the proposed new neighbourhood, Peter Evans Partnership commissioned Atkins to prepare a traffic model for a 2026 design year using the same G-BATS3 model that informed the North Fringe to Hengrove Transport Package. This allowed for a more specific distribution of development within the New Neighbourhood. The new forecasts and conclusions were consistent with the Package Modelling.

- 4) The Government funding allocated towards the suite of transport measures proposed in the bid provides certainty of delivery subject to other related proposals within the Core Strategy being delivered and contributing towards individual schemes. In this regard the East of Harry Stoke New Neighbourhood will play a vital role in realising the delivery of the Stoke Gifford Transport Link through facilitating the construction of the link, providing contributions and coordinating land use and transport planning.

The link will alleviate potential congestion arising from the new neighbourhood but will also facilitate increased permeability in the North Fringe and reduce congestion arising from existing development and proposals set out in the Council's Core Strategy.

- 5) The Peter Evans Partnership has liaised with both the Highways Agency and South Gloucestershire Council on the East of Harry Stoke New Neighbourhood since this was proposed in the draft Core Strategy. There is an agreed statement of Common Ground between the Highways Agency and CSP where the Highways Agency confirms that it has no objection from a transport perspective to the allocation of the East of Harry Stoke New Neighbourhood.
- 6) It is therefore submitted that existing and proposed congestion will only be addressed through the delivery of the growth envisaged in the Core Strategy, particularly the East of Harry Stoke New Neighbourhood which will perform a key role in delivering strategic transport infrastructure.

Is the possible identification of a major sports facility in this area a good use of urban land or are there alternative locations better suited for this purpose?

- 7) The proposed provision of a major sports stadium is supported as it will assist in addressing the current imbalance between employment and alternative uses in this particular part of the North Fringe. This imbalance has resulted in unsustainable commuting patterns, an impaired evening economy and a relatively poor level of local services and facilities to cater for existing and proposed residents. The stadium proposals will help alleviate these issues by facilitating off-peak transport movements, mixed-use development that will create synergies with surrounding uses, an evening economy and a diversification of employment opportunities. The alternative to a stadium would be the delivery of further commercial development that would exacerbate existing problems in the area.
- 8) A stadium will act as cultural and sporting attraction in built-up part of the District that is currently lacking in such facilities to the detriment of existing residents and the local economy. As acknowledged in the Core Strategy¹, the North Fringe lacks a clear identity and sense of place and therefore it is critical that additional housing and cultural facilities such as the proposed stadium are promoted, thereby transforming the North Fringe into a destination.

¹ Core Strategy incorporating Post-Submission Changes, December 2012, Paragraph 12.2

Is there sufficient flexibility in phasing arrangements to ensure housing can be brought forward on other sites in the North Fringe if those being developed are not completed to schedule?

- 9) It is submitted that the phasing arrangements coupled with numerous other measures within the Core Strategy culminate in housing delivery in the North Fringe being sufficiently flexible.
- 10) The overall housing target in the Core Strategy is a key consideration, particularly as the Council is confident that it has allocated more sites than required to meet the minimum level of housing need. If it is right that the requirement is only for 21,500 homes but the Core Strategy has identified a supply of 26,400 then there is a reasonable degree of in-built flexibility. Moreover, the fact that windfall housing development can now be considered an appropriate contributor² to supply in the first 15 years strengthens that position further.
- 11) In addition to the above, it is contended that whilst the phasing table associated with Policy CS15 is optimistic, it is not overly restrictive as it sets out five-year phasing timeframes. Within each 5-year timeframe it is possible for any short-term housing supply shortfalls to be addressed without impacting upon the overall housing schedule in the Core Strategy. In addition the phasing table enables staggered delivery and it is possible for housing to be delivered earlier than envisaged should market forces dictate.
- 12) Crest Strategic Projects (CSP) only has controlling interests at the East of Harry Stoke New neighbourhood and is therefore not in a position to comment on the Cribbs/Patchway New Neighbourhood. Accordingly our comments below specifically relate to the delivery of the East of Harry Stoke New Neighbourhood.
- 13) RPS has presented evidence through its representations³ that demonstrates how the Harry Stoke Local Plan allocation (1,200 homes) and the East of Harry Stoke New Neighbourhood (2,000) is likely to be delivered and completed by the end of the plan period. This represents a robust assessment of delivery and reflects the extensive partnership-working between CSP, the Council and other key stakeholders that will influence the delivery of housing at the site. We are therefore confident that the neighbourhood can be delivered in accordance with the Core Strategy's programme.
- 14) In addition to the above, in an effort to maximise flexibility in relation to the delivery of the new neighbourhood, SGC and CSP has sought to ensure that minor delays in the delivery of the SGTL does not unduly impact upon housing delivery by making representations in respect of Policy CS27.

² NPPF, March 2012, Paragraph 48

³ East of Harry Stoke Statement of Delivery (February 2012)

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- 15) It is concluded, having regard to the above, that the phasing strategy adopted in respect of housing delivery in the North Fringe is inherently flexible with there being numerous other housing supply variables within the Core Strategy that provide flexibility in respect of housing supply.

Development of the new neighbourhood East of Harry Stoke is predicated on the provision of the Stoke Gifford Transport Link. What implications does this have for delivery of the CS should the link be delayed through lack of funding or for other reasons?

- 16) RPS disagrees with the assumption that the East of Harry Stoke New Neighbourhood is predicated on the provision of the Stoke Gifford Transport Link (SGTL) and instead contends that the delivery of the new neighbourhood is directly related to the need to sustainably cater for housing need in the North Fringe.
- 17) The New Neighbourhood, in addition to facilitating the delivery of the SGTL, will deliver 2,000 additional homes adjoining an area dominated by employment uses. The programming of the delivery of the East of Harry Stoke New Neighbourhood was a long running issue throughout the various iterations of the Core Strategy but it has now been refined to instil flexibility in respect of the circumstances that trigger the site's delivery. In the past, the site's release from the Green Belt was reliant upon the delivery of the SGTL however the Core Strategy now recognises that the site is required to address housing need and can be delivered once the programmed delivery of the SGTL has been secured (as opposed to once the link has been delivered).
- 18) This strategic site can come forward in phases irrespective of the delivery of the SGTL as the scheme can utilise its link to the Old Gloucester Road to the east should there be any delay in delivering the SGTL. There is also scope to provide permeability through the site while outstanding issues with the SGTL are being resolved (should such a situation arise). A Statement of Delivery, dated February 2012, supporting the identification of the East of Harry Stoke New Neighbourhood was submitted to the Council earlier this year and the Concept Masterplan located at Appendix 2 of statement outlines the flexibility of the site in terms of utilising linkages to the surrounding transport network.
- 19) Therefore there will be no complications with regard to housing delivery at the new neighbourhood should there be delays in delivering the SGTL subject to there being a programme for the delivery of the link. Therefore the Core Strategy objectives and vision will not be impacted upon.
- 20) Notwithstanding the above, it is also acknowledged that the New Neighbourhood is critical to the delivery of the SGTL owing to the requirement for the link to be accommodated at the site and the payment of developer contributions towards the delivery of the link. Crest Strategic Projects has worked with the Council over the

past 12 months to establish the most appropriate alignment for the SGTL and proposed junction locations to achieve the best practicable design solution to integrate the link into the new neighbourhood. Further detail on the partnership working undertaken between the relevant parties is outlined in more detail in Chapter 5 of the Statement of Delivery (February 2012).

- 21) It is essential that the Core Strategy continues to adoption without haste in order to facilitate a Compulsory Purchase Order of relevant land for the SGTL and the immediate use of Government funding that has been allocated to the proposal.

Are proposals for revised Green Belt boundaries both to the west of the A4018 and as part of the East of Harry Stoke New Neighbourhood appropriate?

- 22) RPS has emphasised throughout the preparation of the Core Strategy that the proposed revisions to the Green Belt boundaries are necessary to ensure that sustainable development can be pursued in the District over the plan period. The Core Strategy represents the most appropriate planning policy document to propose such changes and this has been supplemented by robust evidence in the form of a Green Belt Assessment (December 2011).
- 23) There are exceptional circumstances underpinning the release the East of Harry Stoke land from the Green Belt; the requirement to both meet locally generated housing need and address the imbalance in employment uses within the North Fringe to create a more sustainable community (as desired in the Core Strategy's vision for the area) and to facilitate the integrated delivery of the SGTL. Furthermore the sustainability credentials of the site have been well rehearsed and the proposed removal of the site conforms to National Planning Policy Guidance.
- 24) The NPPF makes clear that account should be taken of the need to promote sustainable patterns of development when reviewing Green Belt boundaries.⁴ It further confirms that when defining Green Belt boundaries no land which is unnecessary to keep permanently open should be included in the Green Belt and boundaries should have regard to permanent, physical features.⁵ It is submitted that the revised Green Belt boundary which accounts for the release of East of Harry Stoke is more robust and defensible than the existing boundary. The M32 and M4 Motorways have long assumed the Green Belt function ascribed to the East of Harry Stoke land and have resulted in the land being segregated from the open Green Belt beyond the motorway network. Accordingly the motorway network represents the physical feature prescribed in the NPPF and therefore represents a more appropriate Green Belt boundary.

⁴ NPPF, March 2012, Paragraph 84

⁵ NPPF, March 2012, Paragraph 85

- 25) Notwithstanding the above, it should be noted that there are some inconsistencies in relevant parts of the Core Strategy which discusses Green Belt and these need to be clarified as part of the Examination in Public. These inconsistencies are outlined in detailed in our representations on the Post-Submission Changes to the Core Strategy (December 2011) however for ease of reference our main concerns are summarised below:
- The Green Belt Assessment (December 2011) sets out the proposed changes to the Green Belt boundary in a diagram however this is not illustrated within the Core Strategy. To provide certainty it is requested that such a crucial illustration be included as part of the Core Strategy.
 - In Figure 5 in respect of both new neighbourhood areas within the North Fringe the Green Belt notation is retained, despite the fact that the text box beneath the diagram states that the diagram is 'amended to reflect policy CS5, position on the Green Belt'. Moreover, in the case of East of Harry Stoke (and in particular on the principal development area north of the A4174) the land adjacent to the M32, M4 and A4174 is shown as 'Significant Green Infrastructure in the Green Belt'.
 - Similar to our comments above, it is suggested that Figure 7 (East of Harry Stoke Framework Diagram) be revised to show the remaining extent of the Green Belt within the scope of the diagram (i.e. north of M4, east of M32). This should include the land to the south of the A4174 and remove the distinction between that land (light green) and adjoining land (dark green, no notation). This would ensure transparency and consistency with other Key Diagrams such as that for Yate.
- 26) Subject to the abovementioned changes to the relevant wording and illustrations within the Core Strategy we fully support the revised Green Belt boundary as proposed and justified within the Green Belt Assessment (December 2011)